

Exhibit 6

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHELLE MARINO, DEBORAH
ESPARZA, MONICA RAEL, and CERA
HINKEY, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

COACH, INC.

Defendant.

CASE NO.:

1:16-cv-01122-VEC (OTW) (Lead)

Consolidated Member Case Nos.:

1:16-cv-03773-VEC (OTW)

1:16-cv-03677-VEC (OTW)

1:16-cv-05320-VEC (OTW)

**DECLARATION OF RICHARD LAMBERT IN SUPPORT OF APPLICATION FOR
ATTORNEY FEES, EXPENSES, AND INCENTIVE AWARDS**

I, Richard Lambert, declare as follows:

1. I am an attorney duly admitted to practice law before all courts of the State of California, I am of counsel in the law firm of Stonebarger Law, A Professional Corporation for Plaintiffs and the Class herein. I make this declaration in support of Plaintiffs' Unopposed Motion for Attorneys' Fees, Costs, and Incentive Awards. If called as a witness, I could and would competently testify to the following:

2. I have personally been involved in the investigation and prosecution of this class action from its inception through the present.

3. I have spent 61.3 hours to date at the rate of \$595 per hour, in prosecuting this case on behalf of the Class through the date of this declaration. These hours spent were calculated from daily time records consistently and contemporaneously maintained by lawyers and professional staff throughout the entirety of this litigation. My current hourly rate has been approved by both state and federal Courts throughout California including in the following false pricing cases such as this one: (i) *Ramos v. PVH Corporation*, Case No. 34-2018-00234829-CU-NP-DGS; (ii) *Guess Outlet Stores Pricing*, JCCP No. 4883; (iii) *Press, et al. v. J. Crew Group, Inc.*, Case No. 56-2018-0052503-CU-BT-VTA; and (iv) *Ramos v. AM Retail Group, Inc.*, Case No. 34-2019-00250084-CU-NP-GDS. My firm's current fee lodestar is \$36,473.50.

4. My firm has spent approximately \$3,160.55 in un-reimbursed expenses incurred in connection with this case. A breakdown of my firm's additional costs incurred in this action is set forth below:

Description	Amount
Court Fees	\$1,100.00
Travel to New York	\$1,900.48
Postage	\$160.07
Grand Total:	\$3,160.55

5. My lodestar billing time records are available if required by the Court. A general summary of my firm's accrued time is as follows:

General Description	Hours	Rate	Lodestar
<i>Pre-Filing Tasks:</i> Client meetings; Perform Research and Analysis; Review Client Documents; Draft Complaint	9.1	\$595	\$5,414.50
<i>Case Management:</i> Attend Case Management Conferences; Prepare and review stipulations; client discussions; periodic teleconferences; strategy meetings with co-counsel; client meetings.	32	\$595	\$19,040.00
<i>Pleadings:</i> Reviewed; amended complaints. Reviewed and revised Opposition to Motion to Dismiss.	16.6	\$595	\$9,877.00
<i>Preliminary Approval and Settlement Agreement:</i> Review and revise Settlement Agreement and Preliminary Approval Documents	2.4	\$595	\$1,428.00
<i>Motion for Attorneys' Fees:</i> Draft Declaration in Support of Motion for Attorneys' Fees	1.2	\$595	\$714.00
TOTAL	61.3	\$595	\$36,473.50

6. Attached hereto as Exhibit 'A' is a true and correct copy of Stonebarger Law, APC's firm resume Stonebarger Law, APC has extensive experience in complex business litigation and class actions. Stonebarger Law, APC, substantially concentrates its practice in the prosecution of class actions and I have successfully served as Class Counsel or Co-Class Counsel prosecuting numerous Class Actions to Judgment against large corporations, recovering tens of millions of dollars in benefits for individuals across the country.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on January 11, 2021, in Folsom, California.

Executed this 11th day of January 2021.

s/ Richard Lambert
Richard Lambert

Exhibit A

Gene J. Stonebarger
Attorney at Law
gstonebarger@stonebargerlaw.com

STONEBARGER LAW, APC, is a law firm dedicated to representing the interests of individuals and small businesses throughout the Country in all aspects of civil litigation. The firm specializes in Class Action Litigation. Our Attorneys have successfully served as Lead or Co-Lead Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California consumer protection statutes, recovering tens of millions of dollars in benefits for individuals across the Country. Our Attorneys have also successfully represented many small businesses as both plaintiffs and defendants in various litigation venues. Stonebarger Law prides itself on the ability of our Attorneys to achieve excellent results for our clients through aggressive, precise, efficient and honest representation.

GENE J. STONEBARGER, ESQ.

BIOGRAPHICAL INFORMATION

Gene J. Stonebarger is the founder of Stonebarger Law, APC. Mr. Stonebarger was selected as a Northern California Super Lawyer in each of the years 2013-2019.

In 2014, Mr. Stonebarger was the recipient of the Consumer Champion Award from the Consumer Federation of California. Mr. Stonebarger received a 2012 California Lawyer Attorney of the Year Award (the "CLAY Award") from California Lawyer magazine for the significant impact his legal work made in the area of Consumer Rights in 2011. Mr. Stonebarger argued the seminal privacy rights case entitled *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011), wherein the California Supreme Court issued a unanimous decision in favor of Plaintiff and Appellant protecting the privacy rights of California consumers, reversing the decisions of the two lower Courts and remanding the case for further proceedings. Mr. Stonebarger had the distinct honor of being the first attorney to present oral argument before Chief Justice Cantil-Sakauye as she began her tenure at the helm of the California Supreme Court and of California's vast judicial branch.

Mr. Stonebarger was awarded the Buck Scholarship in 1993 upon graduation from Linden High School and then went on to receive a Bachelor of Science Degree from U.C. Davis in 1997 and the Degree of Juris Doctor from the University of San Diego School of Law in 2000. Mr. Stonebarger began his legal career working at the prestigious Damrell law firm, where he handled complex civil litigation matters and Class Actions. In January, 2004, Mr. Stonebarger co-founded Lindsay & Stonebarger, APC. Mr. Stonebarger founded Stonebarger Law, APC in January, 2010. Mr. Stonebarger currently specializes his practice in the areas of Class Action and Complex Business Litigation. He is admitted to practice law before all courts of the State of California, the United States District Courts in the Northern, Eastern, Central and Southern Districts of California, as well as the United States Court of Appeals for the Fifth and Ninth Circuits, and the Supreme Court of the United States.

Mr. Stonebarger has successfully represented clients in numerous litigation forums in both Federal and State Court, including but not limited to, the Judicial Council of California, the Judicial Panel on Multidistrict Litigation, The Department of Consumer Affairs, California Courts of Appeal, Trial Courts throughout the State of California and Federal District Courts across the country. Mr. Stonebarger is a member of the State Bar of California, the Consumer Attorneys of California, the Sacramento County Bar Association and the Capitol City Trial Lawyers Association.

EDUCATION

2000 - University of San Diego School of Law (J.D.)

1997 - University of California, Davis (B.S.)

LEGAL EXPERIENCE

2010-Present: Stonebarger Law, APC (Folsom)

2004-2010: Lindsay & Stonebarger, APC (Sacramento, Folsom)

2000-2004: Damrell, Nelson, Schrimp, Pallios, Pacher & Silva (Modesto)

JURISDICTIONS ADMITTED TO PRACTICE

2011- United States Supreme Court

2000- U.S. Court of Appeals for the Ninth Circuit

2010- U.S. Court of Appeals for the Fifth Circuit

2008- U.S. District Court, Central District of California

2006- U.S. District Court, Southern District of California

2001- U.S. District Court, Eastern District of California

2001- U.S. District Court, Northern District of California
2000 - California Supreme Court

PROFESSIONAL MEMBERSHIPS

State Bar of California
Consumer Attorneys of California
Sacramento County Bar Association
Capitol City Trial Lawyers Association
American Association for Justice

ACHIEVEMENTS

California Lawyer Attorney of the Year Award, 2012
Consumer Federation of California, Consumer Champion Award, 2014

LEGISLATIVE TESTIMONY

- Assembly Committee on Judiciary regarding AB 1219, May 10, 2011
- Assembly Committee on Banking regarding AB 1219, May 2, 2011

SPEAKING ACTIVITIES

- American Conference Institute, Data Privacy & Information Security, Dallas, Texas, June 3-4, 2010
- San Francisco Bar Association Song-Beverly Act Panel, August 23, 2011
- American Conference Institute, Privacy & Security of Consumer and Employee Information, Washington, D.C., February 1-2, 2012

PUBLISHED OPINIONS

- *Hernandez v. Restoration Hardware, Inc.*, 4 Cal.5th 260 (2018)
- *Aquirre v. Amscan Holdings, Inc.*, 234 Cal.App.4th 1290 (2015)
- *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011)
- *Alvarez v. Brookstone Company, Inc.*, 202 Cal.App.4th 1023 (2011)
- *Folgelstrom v. Lamps Plus, Inc.*, 195 Cal.App.4th 986 (2011)
- *Powers v. Pottery Barn, Inc.*, 177 Cal.App.4th 1039 (2009)

RICHARD D. LAMBERT, ESQ.

BIOGRAPHICAL INFORMATION

Richard D. Lambert is of counsel of the firm. Mr. Lambert graduated from Grace M. Davis High School in 2000. Mr. Lambert attended Occidental College earning his Bachelor of Arts degree in Economics in 2004. Mr. Lambert attended California Western School of Law, receiving his Juris Doctor *Magna Cum Laude* in 2007. While in law school, Mr. Lambert was an Associate Editor of the California Western Law Review & International Law Journal, an Academic Honors Instructor, and earned three Awards for Academic Achievement (Evidence, Alternative Dispute Resolution, & Trial Practice).

Mr. Lambert's Class Action practice is focused predominantly in the areas labor and employment, consumer protection, and privacy rights litigation. In addition to his Class Action practice, Mr. Lambert also handles Complex Business Litigation matters. He is admitted to practice law before all courts of the State of California. Mr. Lambert is a member of the State Bar of California, the Consumer Attorneys of California, California Employment Lawyers Association, and the Sacramento County Bar Association.

EDUCATION

2007 - California Western School of Law (J.D.), *Magna Cum Laude*

2004 - Occidental College (B.A.), *Omicron Delta Epsilon Honors*

LEGAL EXPERIENCE

2010-Present: Stonebarger Law, APC (Folsom)

2007-2010: Lindsay & Stonebarger, APC (Folsom)

JURISDICTIONS ADMITTED TO PRACTICE

2011 - U.S. District Court, Southern District of California

2011 - U.S. District Court, Central District of California

2010 - U.S. District Court, Northern District of California

2009 - U.S. District Court, Eastern District of California

2007 - California Supreme Court

PROFESSIONAL MEMBERSHIPS

State Bar of California
Consumer Attorneys of California
Sacramento County Bar Association
California Employment Lawyers Association
Phi Alpha Delta, Sacramento State Chapter

PUBLISHED OPINIONS

- *Pineda v. Williams-Sonoma Stores, Inc.*, 51 Cal.4th 524 (2011)
- *Alvarez v. Brookstone Company, Inc.* 202 Cal.App.4th 1023 (2011)
- *Folgelstrom v. Lamps Plus, Inc.*, 195 Cal.App.4th 986 (2011)
- *Powers v. Pottery Barn, Inc.*, 177 Cal.App.4th 1039 (2009)

PRIVACY RIGHTS CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Lead or Co-Lead Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California Civil Code section 1747.08, protecting the privacy rights of consumers, recovering tens of millions of dollars in benefits for individuals across the country, including in the following cases:

- *Matsuo v. American Golf Corporation*, San Joaquin County Superior Court, Case No. CV024865
- *Buzby v. Best Buy Co., Inc.*, San Diego County Superior Court, Case No. GIN040241
- *Children's Place Cases*, Stanislaus County Superior Court, J.C.C.P. No. 4418
- *Castaneda v. Dillard's, Inc.*, San Joaquin County Superior Court, Case No. CV026899
- *Barajas v. The Container Store, Inc.*, San Diego County Superior Court, Case No. GIN 041129
- *Ben Bridge Jeweler Cases*, Sacramento County Superior Court, J.C.C.P. No. 4474
- *Mendez v. Carter's, Inc.*, Sacramento County Superior Court, Case No. 05AS005580
- *O'Keefe v. West Marine, Inc.*, San Diego County Superior Court, Case No. GIC 876869
- *Barajas v. Dixieline Lumber Co.*, San Diego County Superior Court, Case No. GIC 841991
- *Cost Plus Credit Card Cases*, Sacramento County Superior Court, J.C.C.P. No. 4507
- *Wood v. Coach, Inc.*, Contra Costa County Superior Court, Case No. C-07-01146

- *Bell v. Genesco, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081672 CU-BT-CTL
- *Lautenlager v. Sam Ash Music Corporation*, San Diego County Superior Court, Case No. 37-2008-00088948-CU-BT-CLT
- *Andonia v. The TJX Companies, Inc.*, San Diego County Superior Court, Case No. GIC875253
- *Burger v. J.C. Penney Company, Inc.*, San Diego County Superior Court, Case No. 37-2008-00083751-CU-BT-CTL
- *Cole v. Sport Chalet, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081675 CU-BT-CTL
- *Cole v. The Sports Authority, Inc.*, San Diego County Superior Court, Case No. 37-2008-00081686 CU-BT-CTL
- *Johnson v. Lerner New York*, San Diego County Superior Court, Case No. 37-2008-00080567-CU-BT-CTL
- *Anderson v. United Retail*, San Diego County Superior Court, Case No. 37-2008-00089685-CU-BT-CTL
- *Spangler v. Bass Pro Outdoor World, LLC*, San Bernardino County Superior Court, Case No. CIVSS 810285
- *Fogelstrom v. Everfast, Inc.*, San Diego County Superior Court, Case No. 37-2008-00086675-CU-BT-CTL
- *Korn v. Polo Ralph Lauren Corporation*, Eastern District of California, No. 07-CV-02745-FCD-JFM
- *Anderson v. Tuesday Morning Corporation*, San Diego County Superior Court, Case No. 37-2008-00088654-CU-BT-CTL
- *Miller v. Road Runner Sports, Inc.*, San Diego County Superior Court, Case No. 37-2008-00093271-CU-BT-CTL
- *Diebel v. BCBG MAX AZRIA GROUP, Inc.*, San Diego County Superior Court, Case No. 37-2008-00085129-CU-BT-CTL
- *Fogelstrom v. Tween Brands, Inc.*, San Diego County Superior Court, Case No. 37-2008-00060767-CU-BT-NC
- *In Re: Payless Shoesource, Inc. California Song-Beverly Credit Card Act Litigation*, Eastern District of California, Case No. 09-MD-02022 FCD (GGH)
- *Sturgeon v. Jones Retail Corporation*, Southern District of California, Case No. 09-CV-00507-WQH (WVG)
- *Nelson v. Destination Maternity Corporation*, San Francisco County Superior Court, Case No. CGC-11-508949

- *Giacometti v. True Religion Apparel, Inc.*, Placer County Superior Court, Case No. S-CV0027951
- *Vaughan, et al. v. Home Depot U.S.A., Inc.*, Eastern District of California, Case No. 2:11-cv-1041-GEB-CKD
- *Swaney v. Lowe's HIW, Inc.*, Northern District of California, Case No. CV-11-03231
- *Pabst v. Genesco, Inc.*, Northern District of California, Case No. CV-11-04881
- *Sunseri v. Maidenform Brands, Inc.*, Napa County Superior Court, Case No. 26-52359
- *Burdewick v. Leslie's Poolmart, Inc.*, Eastern District of California, Case No. 2:11-CV-01085-JAM-EFB
- *Nordstrom, Inc. Song-Beverly Act Cases*, Los Angeles County Superior Court, JCCP Case No. 4651
- *Vaughan, et al. v. Home Depot U.S.A., Inc.*, Eastern District of California, Case No. 2:11-CV-1041
- *Alvarez v. Brookstone Company, Inc.*, San Diego County Superior Court, Case No. 37-2008-00097745
- *O'Connor v. Euromarket Designs, Inc.*, Northern District of California, Case No. 3:11-CV-02140
- *Georgino v. Sur La Table, Inc.*, Central District of California, Case No. CV 11-03522
- *Seebrook v. The Children's Place Retail Stores, Inc.*, Northern District of California, Case No. 11-CV-00837
- *Krieger v. The Buckle, Inc.*, San Francisco County Superior Court, Case No. CGC-12-517304
- *Morey v. Louis Vuitton North America, Inc.*, Southern District of California, Case No. 11-cv-01517
- *Chaikin v. Lululemon USA Inc., et al.*, Southern District of California, Case No. 12-CV-02481
- *Michaels Stores Song-Beverly Cases*, San Diego County Superior Court, JCCP Case No. 4684
- *O'Leary v. Office Depot, Inc.*, Sacramento County Superior Court, Case No. 34-2012-00131227
- *Dardarian v. OfficeMax North America, Inc.*, Northern District of California, Case No. 4:11-cv-00947
- *Petersen v. Estee Lauder Companies, Inc.*, San Francisco County Superior Court, Case No. CGC-11-509129
- *Hernandez v. Restoration Hardware, Inc.*, San Diego County Superior Court, Case No. 37-2008-00094395-CU-BT-CTL

- *Big 5 Sporting Goods Song-Beverly Cases*, Los Angeles County Superior Court, JCCP Case No. 4667
- *Trader Joe's Song-Beverly Cases*, Los Angeles County Superior Court, JCCP Case No. 4670
- *Hernandez v. Old Navy, LLC*, San Francisco County Superior Court, Case No. CGC-09-484229
- *Zavis v. Swarovski North America LTD*, San Diego County Superior Court, Case No. 37-2015-00003586-CU-BT-CTL
- *Nicolucci v. Sephora USA, Inc.*, San Francisco County Superior Court, Case No. CGC-11-508450
- *Covell v. The Sleep Train, Inc.*, San Diego County Superior Court, Case No. 37-2014-00011275-CU-NP-CTL
- *Harley Seegert v. P.F. Chang's China Bistro, Inc.*, San Diego County Superior Court, Case No. 37-2017-00016131-CU-MC-CTL

CONSUMER CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Class Counsel prosecuting numerous Class Actions to Judgment against large corporations for violations of California consumer protection statutes, recovering millions of dollars in benefits for individuals across the country, including in the following cases:

- *Christopher v. Baskin-Robbins, USA, LLC*, San Diego County Superior Court, Case No. 37-2007-00069556-CU-BT-CTL
- *Kedem v. Toys 'R' Us, Inc.*, Santa Clara County Superior Court, Case No. 1-09- CV-141570
- *In Re: Heartland Payment Systems, Inc. Data Security Breach Litigation*, Southern District of Texas, Case No. 4:09-MD-2046 (Mr. Stonebarger served as a member of the Executive Committee in the Consumer Track Actions in this MDL proceeding relating to a security breach whereby consumer credit card information was compromised)
- *Alcarion v. Charlotte Russe, Inc., et al.*, Southern District of California, Case No. 3:13-cv-01176-DMS-NLS
- *Guess Outlet Stores Pricing Cases*, Los Angeles County Superior Court, JCCP No. 4883
- *Ramos v. AM Retail Group, Inc.*, Sacramento County Superior Court, Case No. 34-2019-00250084-CU-NP-GDS

LENDER MISCONDUCT CLASS ACTION LITIGATION

Attorneys at Stonebarger Law have successfully served as Lead Class Counsel prosecuting Class Actions to Judgment against large lending institutions for violations of California and Federal statutes, including in the following case:

- *Shelton v. GMAC, LLC*, Placer County Sup. Ct., Case No. SCV21807 (Mr. Stonebarger served as Lead Class Counsel in this class action alleging that Defendant Sent 1099-C Cancellation Of Debt Forms To Debtors And Then Subsequently Attempted To Collect On The Canceled Debts)

EMPLOYMENT CLASS ACTION LITIGATION

Stonebarger Law has successfully served as Co-Lead Class Counsel prosecuting Class Actions to Judgment against large companies for violations of California and Federal employment laws, including the following cases:

- *Kool v. Target Corporation*, Eastern District of California, Case No. 2:10-CV-02950-LKK-EFB (Wage and hour class action on behalf of pharmacists)
- *Martin v. Warehouse Demo Services, Inc.*, Northern District of California, Case No. CV-10-04539 MMC (Wage and hour class action on brought on behalf of hourly employees working demonstration tables at Costco's stores across the State)
- *La Masa v. IndyMac Resources, Inc.*, Stanislaus County Superior Court, Case No. 626836 (Wage and hour class action on behalf of former IndyMac employees)
- *Anderson v. Apple American Group, LLC*, Sacramento County Superior Court, Case No. 34-2010-00093705 (Class action brought on behalf of Applebee's employees for being required to purchase uniforms in violation of California Law)
- *Duke v. Adventist Health System/West, et al.*, Sacramento County Superior Court, Case No. 34-2010-00073533-CU-OE-GDS (Wage and hour class action on behalf of former nurses working at St. Helena Hospital Clearlake)
- *Delfierro v. White House Black Market, Inc.*, Sacramento County Superior Court, Case No. 34-2014-00159390
- *Chase, et al. v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No. BC381055 (Coordinated wage and hour class action on behalf of pharmacists employed by Rite Aid)

MILITARY RIGHTS CLASS ACTION LITIGATION

Stonebarger Law served and serves as Co-Lead Class Counsel protecting the rights of Military Members in numerous Class Action lawsuits filed against large companies for violations of federal law, including the Uniformed Services Employment and Reemployment Rights Act (“USERRA”), including the following cases:

- *Duffer v. United Continental Holdings, Inc.*, Northern District of Illinois, Case No. 1:13-cv-03756 (Class action brought on behalf of Military Pilots were United States Military Reservists for United and Continental's violations of USERRA and resolved on a Class-wide basis in 2018 providing millions of dollars to the Class)
- *Moss v. United Airlines, Inc., et al.*, Northern District of Illinois, Case No. 1:16-cv-08496
- *Hoefert v. American Airlines, Inc.*, U.S. District Court, District of Arizona, Case No. 2:17-cv-02996
- *Sorenson, et al. v. Delta Air Lines, Inc.*, Northern District of Georgia, Case No. 1:17-cv-00541
- *Synoracki v. Alaska Airlines, Inc., et al.*, Western District of Washington, Case No. 2:18-cv-01784